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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

The Honorable Stanley A. Bastian

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMANDA GAYLE FERGUSON,

Defendant.

Case No. 2:18-cr-000105-SAB-1

DEFENDANT'S RESPONSE TO UNITED  
STATES' SENTENCING MEMORANDUM

AMANDA GAYLE FERGUSON, by counsel, files her response to the United States' Sentencing Memorandum. The government recommends a sentence of 96 months because "the Defendant is in need of a prolonged period of drug treatment" and "[a] longer sentence in this case may provide greater opportunities for treatment." [ECF 58, pg. 3, lines 19-22].

DEFENDANT'S SENTENCING MEMORANDUM - 1

1 The Federal Bureau of Prisons maintains a website with a few pages devoted to  
2 Substance Abuse Treatment under the heading of Custody and Care.

3 [https://www.bop.gov/inmates/custody\\_and\\_care/substance\\_abuse\\_treatment.jsp](https://www.bop.gov/inmates/custody_and_care/substance_abuse_treatment.jsp)

4 (last visited 11/5/2019). The BOP identifies drug abuse treatment as an evidence  
5 based best practice with “enormous safety and economic benefits to the public.”

6 According to the site, BOP provides in-custody: 1) drug abuse education; 2)  
7 nonresidential drug abuse treatment; and 3) a residential drug abuse program (RDAP).

8 The longest of these programs, RDAP, “is typically nine months in duration.” If

9 Amanda requested and BOP provided all the available in-custody substance abuse  
10 education and treatment available, it would not take 96 months. She could complete  
11 all the treatment and education available in 70 months.

12 According to the BOP website, two facilities in its western region have RDAP  
13 for women, FCI Dublin, California and SCP Phoenix, Arizona.

14 [https://www.bop.gov/inmates/custody\\_and\\_care/docs/rdap\\_locations090119.pdf](https://www.bop.gov/inmates/custody_and_care/docs/rdap_locations090119.pdf)

15 (last visited 11/5/2019). Amanda requests the Court recommend BOP place her at  
16 one of these two facilities.

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1 Dated: November 8, 2019

2 /s/Lorinda Meier Youngcourt  
3 Lorinda Meier Youngcourt  
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8 Counsel for Amanda Gayle Ferguson

6 **Certificate of Service**

7 I certify that on November 8, 2019, I electronically filed the foregoing with the  
8 Clerk of the Court using the CM/ECF System. A copy of which notify Assistant  
9 United States Attorney Timothy J. Ohms and United States Probation Officer Cassie  
10 Lerch.

11 /s/Lorinda Meier Youngcourt  
12 Lorinda Meier Youngcourt  
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